

# IN THE UNITED STATES DISTRICT COURT EASTERN DISTRICT OF PENNSYLVANIA

VITA-MIX CORPORATION 8615 Usher Road Olmsted Township, Ohio 44138

Plaintiff.

CASE NO.

08 5231

**JUDGE** 

v.

DINH LE
a/k/a NAHM LAM
a/k/a XUAN NGUYEN
a/k/a NCBC LE
a/k/a BAIE BIZ
200 Snowberry Way
West Chester, PA 19380

Defendant.

(Jury Demand Endorsed Hereon)

FILED

NOV - 3 2008

MICHAELE. KUNZ, Clerk

By Dep. Clerk

**COMPLAINT** 

Plaintiff Vita-Mix Corporation ("Vita-Mix"), for its Complaint against defendant Dinh Le a/k/a Nahm Lam a/k/a Xuan Nguyen a/k/a NCBC LE a/k/a Baie Biz (hereinafter referred to as "Mr. Le"), alleges as follows:

#### THE PARTIES

- 1. Vita-Mix is an Ohio corporation with its principal place of business at 8615 Usher Road, Olmsted Township, Ohio 44138.
- 2. Upon information and belief, Mr. Le is an individual domiciled in the Commonwealth of Pennsylvania with his residence at 200 Snowberry Way, West Chester, Pennsylvania 19380. Upon information and belief, Mr. Le maintains numerous aliases and may conduct business in the Commonwealth of Pennsylvania under one or more of the following aliases: (i) Nahm Lam; (ii) Xuan Nguyen; (iii) NCBC LE; and (iv) Baie Biz.

#### **JURISDICTION AND VENUE**

- 3. This complaint arises under §§ 32, 43(a) and 43(c) of the Lanham Act (15 U.S.C. §§ 1114, 1125(a) and 1125(c)), as amended, and the statutory and common laws of the Commonwealth of Pennsylvania.
- 4. This Court has subject matter jurisdiction over this action under 28 U.S.C. §§ 1331 and 1338(a) and 15 U.S.C. § 1121, to the extent that the action is predicated on the Lanham Act, and has jurisdiction pendent thereto under 28 U.S.C. § 1338(b) and 28 U.S.C. § 1367(a) and diversity jurisdiction pursuant to 28 U.S.C. § 1332 because the matter in controversy exceeds the jurisdictional amount, exclusive of interest and costs, and is between citizens of different states.
- 5. This Court has personal jurisdiction over Mr. Le because he is domiciled in the Commonwealth of Pennsylvania, regularly sells and distributes products in this judicial district that infringe upon Vita-Mix's marks at issue in this action, regularly solicits business in Pennsylvania and in this judicial district using Vita-Mix's marks, regularly engages in a persistent course of conduct by conducting business in Pennsylvania and in this judicial district, and regularly derives revenue from goods sold and distributed in Pennsylvania and in this judicial district.
- 6. Venue is proper in this judicial district pursuant to 28 U.S.C. § 1391(b) because Mr. Le resides in this district and because a substantial part of the events giving rise to Vita-Mix's claims against Mr. Le occurred in this district.

#### FACTS COMMON TO ALL COUNTS

7. Vita-Mix designs, manufactures, and sells high-performance blenders for the consumer and professional markets. Vita-Mix's blenders are quality engineered for outstanding durability and versatility and can perform more than 50 specialized kitchen functions that include

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creating frozen drinks, grinding grain, cooking soup, mixing juice for whole fruits and vegetables, kneading dough, and freezing and dispensing solid ice cream. Vita-Mix currently distributes its products in all 50 states and in more than 75 countries around the world.

- 8. Vita-Mix has expended substantial sums in advertising, marketing, and promoting its goods in the United States under the VITA-MIX® Mark. Vita-Mix has used the VITA-MIX® Mark as the name of and identifier for a source of quality mixing products since 1937. This use has been consistent and exclusive with respect to mixing and blending products and services in the United States for the last 71 years.
- 9. Due to the excellence and quality of Vita-Mix's goods and services provided under the VITA-MIX® Mark, the VITA-MIX® Mark has acquired an excellent reputation among consumers and the public at large, which recognize the VITA-MIX® Mark as identifying the goods and services of Vita-Mix exclusively. Consumers have come to know the VITA-MIX® Mark as a strong and famous identifier of a single source of high quality mixing and blending products and services. As a result, the VITA-MIX® Mark has become an asset of immeasurable and incalculable value to Vita-Mix.
- 10. On or about December 10, 1996, United States Trademark Registration No. 2,021,896 issued for the VITA-MIX<sup>®</sup> Mark (the "896 Registration", a copy of which is attached as Exhibit A). Vita-Mix is the true and lawful owner of the '896 Registration.
- 11. The VITA-MIX® Mark is and has been in continuous use for more than five (5) consecutive years subsequent to the date of its registration, making the '896 Registration incontestable.
- 12. Vita-Mix has long used four-digit numbers as trademarks to identify and distinguish its blender products. In 1969, Vita-Mix introduced the Vita-Mix 3600™ blender,

which incorporated many features that are well known today, including a blender base, container, tamper, and dispensing spout.

- 13. In 2001, Vita-Mix introduced the Vita-Mix 5000<sup>TM</sup> blender, which incorporated a number of significant technological advancements and improvements over the Vita-Mix 3600<sup>TM</sup> blender. Vita-Mix has offered and sold a number of products using the 5000<sup>TM</sup> Mark, including the Vita-Mix 5000<sup>TM</sup> blender, the Vita-Mix Super 5000<sup>TM</sup> blender, the Vita-Mix Deluxe 5000<sup>TM</sup> blender, and the Vita-Mix Ultimate 5000<sup>TM</sup> blender.
- 14. More recently, Vita-Mix introduced the Vita-Mix 5200<sup>™</sup> blender, which incorporates a number of significant technological advancements and improvements over the Vita-Mix 5000<sup>™</sup> blenders. A true and accurate depiction of the Vita-Mix 5200<sup>™</sup> blender is attached as Exhibit B. Vita-Mix has used and continues to use the mark "5200" in commerce in connection with its blender products and related accessories (the "5200<sup>™</sup> Mark").
- 15. Vita-Mix offers and sells a number of products using the 5200<sup>TM</sup> Mark, including the Vita-Mix 5200<sup>TM</sup> blender, the Vita-Mix Super 5200<sup>TM</sup> blender, and the Vita-Mix Deluxe 5200<sup>TM</sup> blender.
- 16. Since introducing its first 5200<sup>TM</sup> blender, Vita-Mix has aggressively marketed and advertised its blender products using the 5200<sup>TM</sup> Mark in all 50 states. Vita-Mix has widely advertised its products using the 5200<sup>TM</sup> Mark in magazines and trade publications. Vita-Mix has mailed thousands of brochures to actual and potential customers promoting its products using the 5200<sup>TM</sup> Mark. Vita-Mix has conducted hundreds of demonstrations to promote its products using the 5200<sup>TM</sup> Mark. Vita-Mix also has widely advertised its products using the 5200<sup>TM</sup> Mark on the Internet. Vita-Mix's products bearing the 5200<sup>TM</sup> Mark also have received extensive coverage in the national media.

- 17. As a result of Vita-Mix's widespread and continuous use of the 5200<sup>TM</sup> Mark, the 5200<sup>TM</sup> Mark has become well known throughout the United States and is associated in the minds of consumers with blenders and related accessories manufactured or sold by or on behalf of Vita-Mix.
- 18. Vita-Mix products bearing the 5200<sup>™</sup> Mark are offered and sold only through Vita-Mix directly. Other Vita-Mix products are sold and distributed by Vita-Mix through a network of authorized dealers. Each authorized dealer is contractually bound to abide by the terms and conditions of Vita-Mix's advertising, pricing, and marketing policies.
- 19. Mr. Le is not authorized or permitted to sell, offer to sell, advertise, or market Vita-Mix products bearing the 5200™ Mark. Moreover, Mr. Le is not a registered or authorized dealer of Vita-Mix products.
- 20. Without the authorization or permission of Vita-Mix, Mr. Le has, on multiple occasions, sold or solicited sales of blenders using the VITA-MIX<sup>®</sup> and 5200<sup>TM</sup> Marks. By so doing, Mr. Le has purported to represent himself an authorized dealer of Vita-Mix products sold under the VITA-MIX<sup>®</sup> and 5200<sup>TM</sup> Marks.
- 21. Mr. Le's unauthorized use of the VITA-MIX<sup>®</sup> and 5200<sup>TM</sup> Marks has caused Vita-Mix substantial and irreparable injury by depriving Vita-Mix of its absolute right to determine the manner in which the VITA-MIX<sup>®</sup> and 5200<sup>TM</sup> Marks are represented to the general public through merchandising and marketing.
- 22. Mr. Le has unlawfully exploited the commercial value Vita-Mix has developed in the VITA-MIX<sup>®</sup> and 5200<sup>TM</sup> Marks and has caused actual confusion and the likelihood of further confusion as to the origin of the products being sold by Mr. Le and Vita-Mix's sponsorship of or affiliation with Mr. Le.

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- 23. On or about May 8, 2008 and July 1, 2008, Vita-Mix demanded in writing that Mr. Le cease and desist from selling or soliciting the sale of blenders using the VITA-MIX® and 5200<sup>TM</sup> Marks and informed Mr. Le of Vita-Mix's intentions to enforce its intellectual property rights by legal process, if necessary.
- 24. As of the date of this filing, Mr. Le continues to sell, offer to sell, advertise, and market blenders using the VITA-MIX<sup>®</sup> and 5200<sup>TM</sup> Marks.
- 25. Vita-Mix has been and will continue to be irreparably damaged until such time as this Court enjoins Mr. Le's unlawful conduct.

# COUNT I FEDERAL TRADEMARK INFRINGEMENT OF VITA-MIX® MARK

- 26. This is a claim for federal trademark infringement under 15 U.S.C. § 1114.
- 27. The allegations of Paragraphs 1-26 are repeated and re-alleged as though fully set forth herein.
- 28. Mr. Le has used designations that are identical to, or substantially indistinguishable from, the federally-registered VITA-MIX® Mark to sell, offer to sell, advertise, and market blenders.
- 29. Mr. Le has intentionally and recklessly used such designations knowing that they infringe upon Vita-Mix's exclusive rights in and to the VITA-MIX® Mark.
- 30. Mr. Le's use of the VITA-MIX<sup>®</sup> Mark to sell, offer to sell, advertise, and market blenders is and was without Vita-Mix's consent or authorization.
- 31. Mr. Le's unauthorized use of the VITA-MIX® Mark constitutes trademark infringement and likely will continue to:
  - (a) cause confusion, mistake or deception;
  - (b) cause the public to believe that Mr. Le is authorized by Vita-Mix to use

the VITA-MIX® Mark; and

- (c) result in Mr. Le unfairly and improperly benefiting from Vita-Mix's advertising and promotion of the VITA-MIX® Mark and the reputation of Vita-Mix and the VITA-MIX® Mark, all to the substantial and irreparable injury of the public, Vita-Mix's right title and interest in and to the VITA-MIX® Mark, and the substantial goodwill represented thereby.
- 32. Mr. Le's acts constitute trademark infringement in violation of 15 U.S.C. § 1114.
- 33. Mr. Le's acts are and have been willful.
- 34. By these actions, Mr. Le has injured and violated Vita-Mix's rights in an amount to be determined at trial. Further, by his actions, Mr. Le has irreparably injured Vita-Mix, such irreparable injury will continue unless Mr. Le is enjoined by this Court, pursuant to 15 U.S.C. § 1116, from further violation of Vita-Mix's rights, for which Vita-Mix has no adequate remedy at law.

# COUNT II FALSE DESIGNATION OF ORIGIN

- 35. This is a claim for false designation of origin under 15 U.S.C. § 1125(a).
- 36. The allegations of Paragraphs 1-35 are repeated and re-alleged as though fully set forth herein.
- 37. Without consent of Vita-Mix, Mr. Le has created a false designation of origin of the VITA-MIX<sup>®</sup> and 5200<sup>TM</sup> Marks by using designations that are identical to, or substantially indistinguishable from, the VITA-MIX<sup>®</sup> and 5200<sup>TM</sup> Marks to sell, offer to sell, advertise, and market blenders, thereby causing a likelihood that consumers would believe Mr. Le's sales of blenders are associated with, sponsored by, or approved by Vita-Mix, when they are not.
- 38. Mr. Le's acts constitute false designation of origin in violation of 15 U.S.C. § 1125(a).
  - 39. Mr. Le's acts are and have been willful.

40. By these actions, Mr. Le has injured and violated Vita-Mix's rights in an amount to be determined at trial. Further, by his actions, Mr. Le has irreparably injured Vita-Mix, such irreparable injury will continue unless Mr. Le is enjoined by this Court, pursuant to 15 U.S.C. § 1116, from further violation of Vita-Mix's rights, for which Vita-Mix has no adequate remedy at law.

# COUNT III FEDERAL TRADEMARK DILUTION

- 41. This is a claim for federal trademark dilution under 15 U.S.C. § 1125(c).
- 42. The allegations of Paragraphs 1-41 are repeated and re-alleged as though fully set forth herein.
- 43. The VITA-MIX® and 5200<sup>TM</sup> Marks are individually and inherently distinctive and famous, have been used throughout the United States, and are well known to the trade and members of the purchasing public. The public associates and identifies the VITA-MIX® and 5200<sup>TM</sup> Marks with Vita-Mix.
- 44. The VITA-MIX® and 5200<sup>TM</sup> Marks have been advertised throughout the United States and have received continuous widespread national publicity.
  - 45. The VITA-MIX® and 5200<sup>TM</sup> Marks became famous prior to Mr. Le's use thereof.
- 46. Mr. Le's use of the VITA-MIX<sup>®</sup> and 5200<sup>TM</sup> Marks diminishes or dilutes the distinctive quality of the VITA-MIX<sup>®</sup> and 5200<sup>TM</sup> Marks.
- 47. Mr. Le's use of the VITA-MIX<sup>®</sup> and 5200<sup>™</sup> Marks has eroded and diminished the goodwill Vita-Mix enjoys in the VITA-MIX<sup>®</sup> and 5200<sup>™</sup> Marks.
- 48. Mr. Le's use of the VITA-MIX® and 5200<sup>TM</sup> Marks has diminished the capacity of consumers to associate the VITA-MIX® and 5200<sup>TM</sup> Marks with Vita-Mix's products and has caused negative associations with the VITA-MIX® and 5200<sup>TM</sup> Marks in the minds of the consumer.

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- 49. Mr. Le willfully intended to trade upon the reputation of Vita-Mix and willfully caused dilution of the VITA-MIX® and 5200<sup>TM</sup> Marks.
- 50. Mr. Le's acts as alleged herein constitute federal trademark dilution under 15 U.S.C. § 1125(c).
- 51. Vita-Mix has no adequate remedy at law and has suffered and continues to suffer irreparable harm and damage as a result of Mr. Le's acts in an amount to be determined at trial.

# COUNT IV TRADEMARK INFRINGEMENT IN VIOLATION OF PENNSYLVANIA STATE LAW

- 52. This is a claim for trademark infringement arising under the Pennsylvania Trademark Act, 54 Pa. C. S. § 1101, et seq.
- 53. The allegations of Paragraphs 1-52 are repeated and re-alleged as though fully set forth herein.
- 54. By reason of the foregoing acts, Mr. Le has intentionally caused a likelihood of confusion among the purchasing public in this judicial district and elsewhere, thereby unfairly competing with Vita-Mix in violation of 54 Pa. C. S. § 1123.
- 55. By reason of Mr. Le's actions, Mr. Le has irreparably injured the consumer recognition and goodwill associated with the VITA-MIX<sup>®</sup> and 5200<sup>TM</sup> Marks, and such injury will continue unless enjoined by this Court. Mr. Le's actions have damaged Vita-Mix in an amount to be determined at trial.

# COUNT V TRADEMARK DILUTION IN VIOLATION OF PENNSYLVANIA STATE LAW

56. This is a claim for trademark dilution arising under the Pennsylvania Trademark Act, 54 Pa. C. S. § 1101, et seq.

- 57. The allegations of Paragraphs 1-56 are repeated and re-alleged as if fully set forth herein.
- 58. Mr. Le's use of the famous VITA-MIX® and 5200<sup>TM</sup> Marks has diluted the distinctive quality of the VITA-MIX® and 5200<sup>TM</sup> Marks, and such conduct is likely to further dilute the VITA-MIX® and 5200<sup>TM</sup> Marks in violation of 54 Pa. C. S. § 1124.
- 59. Mr. Le's actions have damaged Vita-Mix in an amount to be determined at trial. Mr. Le's actions have damaged Vita-Mix irreparably and such damage will continue unless Mr. Le is enjoined by this Court.

#### COUNT VI UNFAIR COMPETITION

- 60. This is a claim for common law unfair competition.
- 61. The allegations of Paragraphs 1-60 are repeated and re-alleged as though fully set forth herein.
- 62. The acts of Mr. Le were committed willfully and with full knowledge of the rights of Vita-Mix and with the intention of deceiving and misleading the public and of wrongfully misappropriating and trading upon the nationally recognized value of the goodwill and reputation inherent in the VITA-MIX® and 5200<sup>TM</sup> Marks.
  - 63. Mr. Le's acts are and have been without Vita-Mix's consent or authorization.
- 64. By reason of the foregoing acts, Mr. Le has intentionally caused a likelihood of confusion among the purchasing public in this judicial district and elsewhere, thereby unfairly competing with Vita-Mix in violation of the common law of the Commonwealth of Pennsylvania.
- 65. Mr. Le's misappropriation and unfair competition interfered and will continue to interfere with Vita-Mix's rights and ability to exploit the commercial value of the VITA-MIX® and 5200<sup>TM</sup> Marks.

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- 66. Mr. Le has received substantial profits from his unauthorized use and misappropriation of the VITA-MIX<sup>®</sup> and 5200<sup>TM</sup> Marks and has become unjustly enriched thereby.
- 67. Mr. Le's aforesaid actions constitute unlawful, unfair, malicious, reckless or fraudulent practices that have injured and violated the rights of Vita-Mix in an amount to be determined at trial. Further, by these actions, Mr. Le has irreparably injured Vita-Mix's business, reputation and goodwill, and such irreparable injury will continue unless Mr. Le is enjoined by this Court from further violation of Vita-Mix's rights, for which Vita-Mix has no remedy at law.
- 68. Mr. Le's willful acts of unfair competition under the common law of the Commonwealth of Pennsylvania constitute fraud, oppression, and malice. Accordingly, Vita-Mix is entitled to punitive damages in accordance with Pennsylvania law.

# COUNT VII INTENTIONAL INTERFERENCE WITH PRESENT AND PROSPECTIVE ECONOMIC ADVANTAGE

- 69. This is a claim for intentional interference with present and prospective economic advantage arising under the common law of the Commonwealth of Pennsylvania.
- 70. The allegations of Paragraphs 1-69 are repeated and re-alleged as though fully set forth herein.
- 71. Mr. Le is aware that Vita-Mix has contractual arrangements and relationships with authorized dealers relating to the sale of blenders, which cause economic benefit to Vita-Mix.
- 72. With actual knowledge of those contracts, Mr. Le has wrongfully impaired and will continue to wrongfully impair the value of the VITA-MIX® and 5200<sup>TM</sup> Marks and has disrupted and will continue to disrupt the contractual arrangements and relationships between Vita-Mix and its authorized dealers relating to the sale of blenders, proximately causing economic harm to Vita-Mix.

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73. As a result of Mr. Le's actions, Vita-Mix has been damaged in an amount to be determined at trial. Such damage will continue unless and until enjoined by this Court.

#### PRAYER FOR RELIEF

WHEREFORE, Vita-Mix respectfully requests that the Court enter judgment in its favor on all of the counts set forth herein and grant the following relief:

- (1) That Mr. Le, his agents, servants, employees, and attorneys, and all persons in active concert or participation with them who receive actual notice of this Order, be enjoined preliminarily until hearing and permanently thereafter from:
  - (a) distributing, selling, offering for sale, holding for sale or advertising any goods or services bearing the names, marks, logos or trademarks of Vita-Mix, including but not limited to the VITA-MIX<sup>®</sup> and 5200<sup>™</sup> Marks, or any colorable variation thereof;
  - (b) representing that any goods or services that are offered, advertised, marketed, organized or sponsored by Mr. Le are authorized by or are affiliated with Vita-Mix;
  - (c) falsely designating the origin of Mr. Le's goods or services;
  - (d) unfairly competing with Vita-Mix in any manner whatsoever;
  - (e) causing a likelihood of confusion or injury to Vita-Mix's business reputation;
  - (f) diluting the distinctive quality of Vita-Mix's marks;
  - (g) interfering with Vita-Mix's present and prospective economic advantage; and
  - (h) otherwise infringing on Vita-Mix's trademark rights.
- (2) That Mr. Le be directed to file with this Court and serve on Vita-Mix within thirty (30) days after the service of the injunction a report in writing, under oath, setting forth in detail the manner and form in which Mr. Le has complied with the injunction.

(3) That Mr. Le be required to account to Vita-Mix for any and all profits derived by

Mr. Le by reason of Mr. Le's acts complained of herein.

(4) That Mr. Le be ordered to pay over to Vita-Mix all damages that Vita-Mix has

sustained as a consequence of the acts complained of herein, subject to proof at trial, and that Vita-

Mix be awarded Mr. Le's profits derived by reason of said acts or as determined by said accounting.

(5) That such damages and profits be trebled and awarded to Vita-Mix pursuant to 15

U.S.C. § 1117, 54 Pa C. S. § 1125, or both.

(6) That Vita-Mix be awarded its costs, attorneys' fees, and expenses in this suit under

15 U.S.C. § 1117, 54 Pa. C. S. § 1125, or both.

(7) That Vita-Mix be awarded punitive damages in accordance with Pennsylvania law.

(8) That Mr. Le be required to deliver up for destruction all labels, signs, prints,

wrappers, advertisements, and/or other matter bearing the unauthorized reproduction or imitation of

the VITA-MIX® and 5200<sup>TM</sup> Marks and all means for making such reproductions or imitations of

the VITA-MIX<sup>®</sup> and 5200<sup>TM</sup> Marks pursuant to 15 U.S.C. § 1118.

(9) That Vita-Mix be awarded such other and further relief as the Court deems to be

reasonable, necessary and just under Vita-Mix's claims or otherwise.

Respectfully submitted,

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Counsel for Vita-Mix Corporation

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#### JURY DEMAND

Plaintiff Vita-Mix Corporation ("Vita-Mix") respectfully demands trial by jury on all issues so triable on its Complaint against defendant Dinh Le a/k/a Nahm Lam a/k/a Xuan Nguyen a/k/a NCBC LE a/k/a Baie Biz.

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Counsel for Vita-Mix Corporation

# Exhibit A

Int. Cl.: 7

Prior U.S. Cls.: 13, 19, 21, 23, 31, 34 and 35

Reg. No. 2,021,896

United States Patent and Trademark Office

Registered Dec. 10, 1996

## TRADEMARK PRINCIPAL REGISTER

#### **VITA-MIX**

VITA-MIX CORPORATION (OHIO CORPORA-TION) 8615 USHER ROAD CLEVELAND, OH 44138

FOR: ELECTRIC FOOD PROCESSORS AND ELECTRIC FOOD BLENDERS FOR DOMESTIC AND COMMERCIAL USE, IN CLASS 7 (U.S. CLS. 13, 19, 21, 23, 31, 34 AND 35).

FIRST USE 5-1-1937; IN COMMERCE 5-1-1937.
OWNER OF U.S. REG. NOS. 572,213, 1,849,002, AND 1,852,210.

SER. NO. 74-730,529, FILED 9-18-1995.

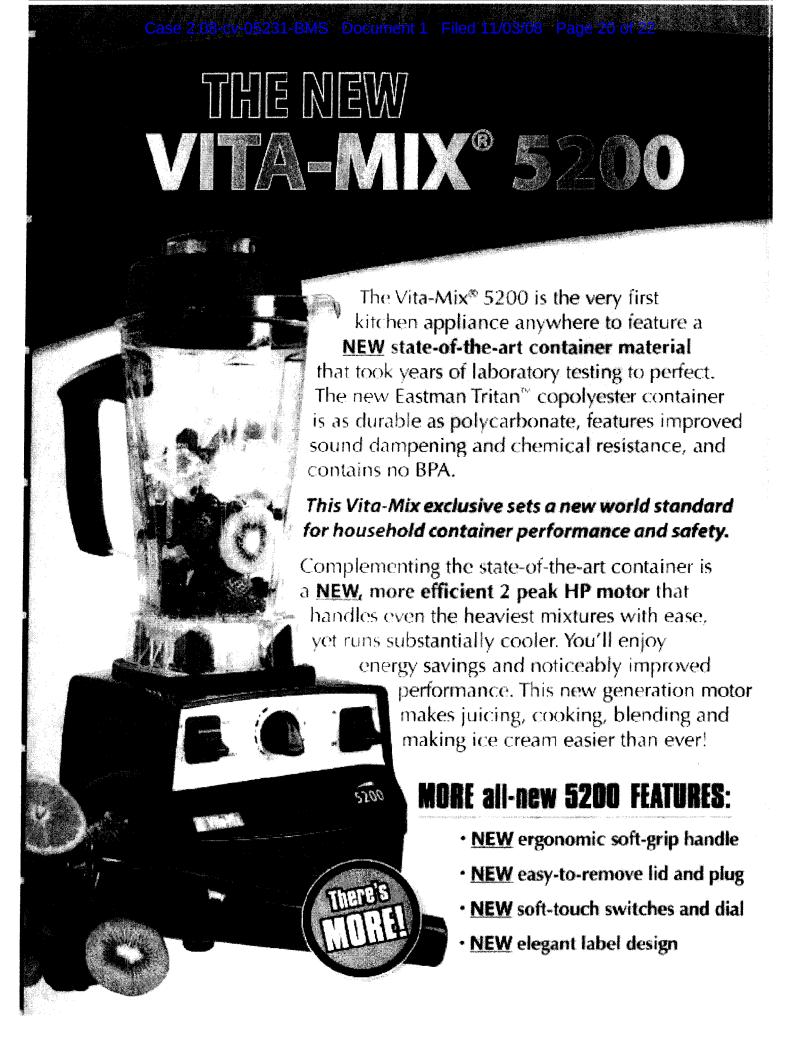
ANTHONY R. MASIELLO, EXAMINING ATTORNEY

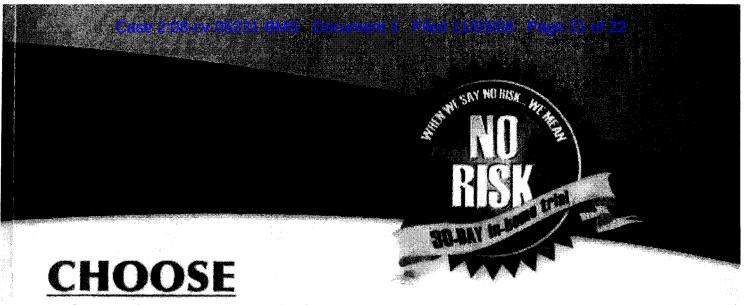
# Exhibit B

57.00



THE WITA-MIX<sup>®</sup>
5200





...the ALL-NEW Vita-Mix 5200 or Vita-Mix Super 5200!

...your updated and enhanced color—Black or White!

# LOOK

...at everything you get with both exciting **NEW** packages!

- An amazing 7-year Warranty that <u>GUARANTEES</u> troublefree performance
- Exclusive tamper tool for QUICKER, EASIER processing of heavier loads
- <u>NEW</u> container, 64 oz. made from Tritan<sup>®</sup> copolyester, with stainless steel Wet Blades
- FREE Updated Whole Food Recipes cookbook—over 300 recipes—a \$50 value
- FREE All-New Getting Started cookbook—step-by-step guide— \$16 value
- FREE "Let's Get Started!" DVD TV
  "Cooking Show" quality—\$25 value
- FREE Standard Shipping with savings code on brochure—
   \$25 value

# Get two AMAZING EXTRAS only available with the VITA-MIX SUPER 5200 package!

- NEW container, 32 oz. made from Tritan<sup>®</sup> copolyester, with stainless steel Dry Blades
- FREE Whole Grains cookbook for use with the special Dry Blade container—\$15 value

# Yes, you can have it all CALL: 1-800-VITAMIX NOW!

(1-800-848-2649)

**VISIT:** www.getvitamix.com

...or turn the page for all the exciting details...

# Exclusive "Sneak Preview"— JUST FOR YOU!

**CHOOSE** Vita-Mix Super 5200, including

GIFTS AND SAVINGS valued at \$175...just \$549!

Black: 001374

White: 001373

# TOTAL PACKAGE VALUE: \$724!

CHOOSE Vita-Mix 5200, including

GIFTS AND SAVINGS valued at \$116...just \$449!

Black: 001372

White: 001371

# TOTAL PACKAGE VALUE: \$565!

### **AMAZING INNOVATION! AMAZING VALUE!**

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You can be the **FIRST** to own the **FINEST!** 



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